

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAMES SMITH, on behalf of himself and)	
all others similarly situated, and on behalf of)	NO.: 1:20-CV-02350
the TRIAD MANUFACTURING, INC.)	
EMPLOYEE STOCK OWNERSHIP PLAN,)	
)	JUDGE: GUZMAN
Plaintiffs,)	
)	
vs.)	MAG. JUDGE: KIM
)	
GREATBANC TRUST COMPANY; THE)	
BOARD OF DIRECTORS OF TRIAD)	
MANUFACTURING, INC.; DAVID)	
CAITO; ROBERT HARDIE; and)	
MICHAEL McCORMICK,)	
)	
Defendants.)	

**JOINT MOTION FOR EXTENSION OF TIME TO FILE
JOINT STATUS REPORT REGARDING WRITTEN DISCOVERY ISSUES**

NOW COMES the Plaintiff JAMES SMITH (“Smith”), and the Defendants GREATBANC TRUST COMPANY (“GreatBanc”), the BOARD OF DIRECTORS OF TRIAD MANUFACTURING, INC., DAVID CAITO, ROBERT HARDIE, and MICHAEL McCORMICK (the “Triad Defendants”) (hereinafter the Plaintiff and Defendants shall collectively be referred to as the “Parties”), by and through their respective undersigned counsels, and hereby jointly request this Honorable Court extend the deadline to file a Joint Status Report Regarding Written Discovery Issues currently set for December 30, 2021 (Dkt. No. 78) to January 7, 2021 for the reasons set forth herein. In support of this request, the Parties state as follows:

1. On October 12, 2021, this Honorable Court set forth a written discovery schedule which includes a deadline of December 30, 2021 for the Parties to file a “joint status report identifying each side’s written discovery issues, along with relevant written discovery

responses as exhibits.” (Dkt. No. 78).

2. To date, the Parties have exchanged written discovery requests and written responses.
3. Smith has produced documents responsive GreatBanc and the Triad Defendants’ requests.

GreatBanc and the Triad Defendants have made an initial production of documents responsive to Smith’s discovery requests and are diligently reviewing documents for continuing production to Smith.
4. On December 17, 2021, the Parties conducted a telephone conference to discuss discovery status and potential issues regarding written discovery responses.
5. The Parties are continuing to discuss potential issues and to produce responsive documents and believe that an additional one week extension of the current deadline, from December 30, 2021 to January 7, 2021, would provide the Parties sufficient time following the holidays to confer further regarding the Parties’ responses in order to determine, consider, and draft the Joint Status Report Regarding Written Discovery Issues.

WHEREFORE, the Parties respectfully request that this Honorable Court enter an Order extending the deadline currently set for the Joint Status Report Regarding Written Discovery Issues from December 30, 2021 to January 7, 2021.

Dated: December 17, 2021

Respectfully Submitted.

JAMES SMITH

/s/ Mary J. Bortscheller
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GREATBANC TRUST COMPANY

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**BOARD OF DIRECTORS OF TRIAD
MANUFACTURING, INC., DAVID
CAITO, ROBERT HARDIE, and
MICHAEL McCORMICK**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on today's date, December 17, 2021, she served a copy of the *Parties Joint Motion for Extension of Time to File Joint Status Report Regarding Written Discovery Issues* on all parties via operation of the Court's CM/ECF electronic filing system.

/s/ Laura E. Older